

# FRANKEL RUDDER & LOWERY, LLP

A t t o r n e y s   a t   L a w

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Steven K. Frankel  
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July 18, 2007

***By Hand***

Honorable Kenneth M. Karas  
United States District Court Judge  
United States District Court  
500 Pearl Street, Room 920  
New York, New York 10007-1581

Re: United States v. Cleon Taylor  
Docket No. S1 06 Cr. 189 (KMK)

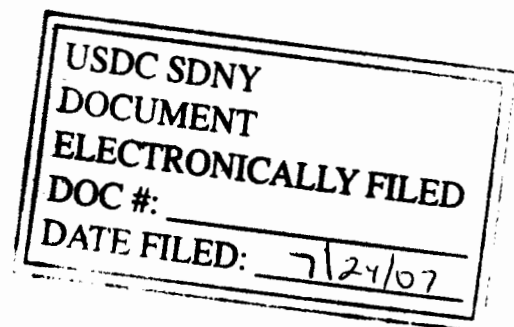
Dear Mr. Karas:

Today I met, again, with Cleon Taylor at the Metropolitan Detention Center to work together to finalize our submission, which is due on July 20, 2007.

Unfortunately, we have been unable to obtain some of the relevant medical, employment and school records which are needed to fully document and explain Mr. Taylor's actions and the circumstances which we believe are inaccurately recounted in the government's sentencing letter to the Court.

Mr. Taylor's sister, Torrie, his fiancé Keisha and two friends have agreed to provide letters documenting threats and efforts to locate Cleon by defendant John Floyd, the drug dealer and his associates from whom Cleon had purchased one hundred (100) grams of crack at the direction and under the supervision of government agents. Also, since the Court computer does not provide details of the prosecution of John Floyd, absent the government's assistance we cannot determine whether defendant Floyd also is cooperating with the government and has helped or is helping in prosecutions of additional narcotics cases for which Mr. Taylor should be entitled to substantial credit.

We also ask that the government provide the letter which Mr. Taylor's former supervisor at his job admits to writing on Mr. Taylor's behalf. Since the government is relying on the issue of the second allegedly fraudulent character letter from Mr. Eric Bounds, it is impossible to compare the language and timing of the two documents. In any event, we will be requesting a hearing to develop the facts we will ask the Court to consider in determining the appropriate sentence in this case.



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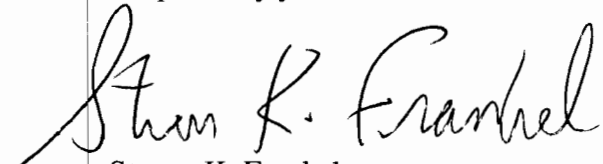
Finally, I had hoped to meet this week with Lawrence Ruggiero, Esq., predecessor counsel for Mr. Taylor, prior to completing our submission. I was out on Monday, and he was unavailable yesterday and today to arrange a meeting, although he has been very cooperative and certainly can provide important insights.

We respectfully request one final extension of time for us to file our sentencing submission to August 3, 2007.

The need for additional time is, in part, due to the delay in obtaining the needed documents and my schedule. July 23<sup>rd</sup> is our wedding anniversary and I will be out of the office and must attend a court ordered deposition scheduled for July 24<sup>th</sup> in Nassau County. I also have court appearances on July 25 and 26 and two cases on July 27<sup>th</sup>.

Please accept our apology for any inconvenience to the Court. I thank you for your consideration and courtesies in this matter.

Respectfully yours,




Steven K. Frankel

SKF/ma

cc: David B. Massey, Esq. (via facsimile transmission)  
Assistant United States Attorney

Granted,

So ordered.



7/20/07